

**Great Lakes and Environment, joint meeting with House Appropriations, DEQ  
March 17, 2009  
Testimony of the Michigan United Conservation Clubs (MUCC)**



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**Position:**

Wetlands are critical to perpetuate the healthy and abundant game species that are important to the hunting, fishing and trapping community. The State of Michigan's wetlands program provides timely permits and more effective protection of our wetland resources than we can be confident in receiving under a federal program.

MUCC understands that cuts are necessary to minimize the impact of our current economic crisis in Michigan. We caution, however, against making a drastic change to Michigan's wetlands protection program before more thoroughly assessing alternatives.

For example, before turning this critical program over to the federal government, the DEQ must have the opportunity to take a harder look at more efficient ways of administering this program, such as the recommendations made by the Environmental Advisory Committee (of which MUCC is a member) last year that have not yet been enacted. These recommendations were designed to make the program more effective and efficient, but not all were enacted. It's possible that implementing these additional improvements may provide needed efficiencies as opposed to eliminating the program and its related protections.

Another fact that must be considered in evaluating this proposal is that even if the 404 program is returned to the federal government, Michigan will continue to have responsibilities in this area under Section 401 of the Clean Water Act because it requires state certifications of federal permits. States that do not have 404 authorization still dedicate significant staff resources to administering their Section 401 certification responsibilities.

At the same time, we believe the DEQ should be urged to take a harder look at other places to make necessary financial reductions before they cut a program that has so many far reaching benefits.

**Environmental Advisory Council Recommendations:**

Using Value Stream Mapping<sup>1</sup>, the Land and Water Management of the DEQ outlined various program changes they had been considering to streamline their programs, including wetlands. The Environmental Advisory Council used these results to draft recommendations to the DEQ for making their programs more effective and efficient. This report is attached.

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<sup>1</sup> Value Stream Mapping is a process of reviewing program functions to identify program changes that would have the most value.



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One such recommendation is to transfer permit decisions to the field. This would take some realignment of staff, but would save money in the long run because it is a more efficient way of administering the program.

Another recommendation was to eliminate duplicate federal and state permitting requirements for Clean Water Act, Section 25 which governs waters and contiguous wetlands (coastal waters and contiguous waters) under the CWA 404 program. Even under state assumption of the 404 program, these activities are required by the CWA to have a federally issued 404. The DEQ is in the process of program changes to eliminate this duplication, but it is not fully implemented.

**Value of wetlands to Michigan's hunters, anglers and trappers:**

Hunters, anglers and trappers contribute over \$3.4 billion every year to Michigan's economy annually in license fees, transportation, lodging, guide services, and more in order to pursue their sport. This number does not include the actual sale of the furs from trapping.

Strong, healthy wetlands are the nurseries and homes for many of the species that Michigan's hunters, anglers and trappers depend upon for their sport. Species such as muskrat, mink, beaver, pike, muskellunge, ducks and many other depend on wetlands for their breeding grounds, food and habitat. Further, our wetlands and associated uplands serve as critical buffer strips to the Great Lakes that provide for Michigan's unmatched sport fishery.

We understand that cuts are being made everywhere in response to our economic crisis, but this is a program that provides valuable protections to resources that are vital to Michigan's hunters, anglers and trappers. Before turning this critical program over to the feds, this process should require that the DEQ take a harder look at more efficient ways to administer this program as well as alternate funding sources.

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